

## **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

MILES GUO,  
a/k/a “Ho Wan Kwok,”  
a/k/a “Miles Kwok,”  
a/k/a “Guo Wengui,”  
a/k/a “Brother Seven,”  
a/k/a “The Principal,”  
a/k/a “Boss,”

Defendant.

**STIPULATION**

S3 23 Cr. 118 (AT)

IT IS HEREBY STIPULATED AND AGREED, by the United States of America and Miles Guo, the defendant, through their attorneys of record that:

1. The FBI has investigated individuals who, working at the direction of the government of the People’s Republic of China (the “PRC government”) have engaged in an international campaign, known as “Operation Fox Hunt,” to coerce individuals located in the United States and elsewhere to return to China to face charges brought by the PRC government or to otherwise reach financial settlements with the PRC government.

2. In 2017, a U.S. law enforcement agency assessed that Mr. Miles Guo was the highest priority of China’s repatriation efforts.

3. In 2017, a U.S. law enforcement agency received information that Chinese officials were paying and providing food and signs to protestors of Mr. Guo.

4. In 2018, a U.S. law enforcement agency received information that the PRC government had established a special investigative group in China to manage China’s investigation of, and actions against, Mr. Guo.

DEFENSE EXHIBIT  
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5. To carry out some of the objectives of Fox Hunt, in 2017, the PRC government tasked a specially-designated group of operatives (the “Group”) with discrediting and harassing individuals including Mr. Guo by using interactive computer services and electronic communication systems. The Group is based out of the Beijing Municipal Public Security Bureau at a facility in Beijing’s Dongcheng District. The Group was previously referred to as the “Cyber Investigation Team” and was later referred to as the “912 Special Project Working Group.” The Group’s tactics aimed at Mr. Guo included using anonymized social media accounts operated by the Group and by pressuring U.S. social media companies to remove Mr. Guo and U.S.-based associates of Mr. Guo from social media platforms. These efforts were part of the PRC government’s broader effort to prevent, disrupt, and harass Mr. Guo’s use of social media and other online platforms to disseminate and discuss disfavored content. In or about December 2018, officers of the Group were directed to post three videos or posts daily with YouTube and Facebook accounts, with one of the posts required to be anti-Mr. Guo. On February 3, 2020, a PRC government official issued a tasking requirement that every member of the Group shall write an original article with content related to targeting Mr. Guo, the COVID pandemic, or Hong Kong. The FBI investigated the Group’s activities, including its activities aimed at Mr. Guo, and the U.S. Government has charged many of the Group’s members with violations of U.S. law.

6. Since Mr. Guo fled the PRC, the PRC government has sought his return for prosecution in the PRC and has employed numerous methods to effect Mr. Guo’s capture or arrest. In May 2017, the PRC government sent four undeclared agents from the PRC’s Ministry of State Security (“MSS”) to the United States to attempt to cause Mr. Guo’s coerced repatriation to the PRC as part of the “Fox Hunt” initiative. The U.S. Government disrupted the PRC government’s efforts to forcefully repatriate Mr. Guo, and Mr. Guo continued to reside in the United States.

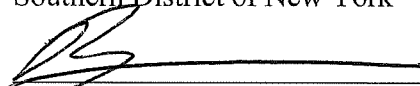
7. Between May 2017 and January 2018, at least four individuals, including George Higginbotham, Elliot Broidy, Nickie Lum Davis, and Prakazrel Michel, never disclosed that they were actually acting on behalf of foreign actors, including the PRC government, to lobby officials in the Trump administration in an effort to cause Mr. Guo's extradition to China. Higginbotham, Broidy, Davis, and Michel were each convicted of violating U.S. law regarding their lobbying efforts. The efforts of these individuals were not successful, and Mr. Guo was never extradited at the request of the PRC government. Instead, and since approximately 2015, Mr. Guo has been able to reside in the United States with his family.

8. On October 23, 2018, a court in Hong Kong entered an order seizing and restraining Mr. Guo's assets in Hong Kong and elsewhere under the court's jurisdiction.

IT IS FURTHER STIPULATED AND AGREED that this stipulation may be admitted into evidence.

DAMIAN WILLIAMS  
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Southern District of New York

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